

April 19, 2024

Via ECF

The Honorable Katherine Polk Failla, U.S.D.J.
Thurgood Marshall United States Courthouse
40 Foley Square
New York, New York 10007

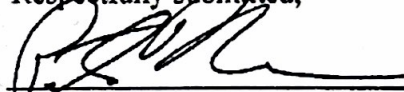
Re: *Securities and Exchange Commission v. Coinbase, Inc. et al.*, 23 Civ.
4738 (KPF)

Dear Judge Failla:

Plaintiff Securities and Exchange Commission ("SEC") and defendants Coinbase, Inc. and Coinbase Global, Inc. (together, "Coinbase") respectfully submit this joint letter and the enclosed proposed case management plan to the Court.

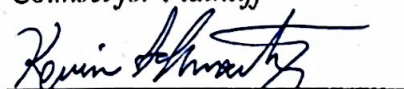
The parties met and conferred regarding the proposed case management plan and were able to agree on all terms except for item 7(e)-7(f). As to item 7(e)-7(f) (the close of fact discovery and expert discovery), Coinbase proposes October 18 and December 20, 2024, and the SEC proposes August 19 and October 18, 2024.

Respectfully submitted,



Peter A. Mancuso

Counsel for Plaintiff



Kevin S. Schwartz

Counsel for Defendants

Cc: All counsel of record (via ECF)